

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT WEST VIRGINIA**

**CRYSTAL GOOD,  
West Virginia residents, *et al.*  
on behalf of themselves and all others  
similarly situated,**

**Plaintiffs,**

**v.**

**AMERICAN WATER WORKS  
COMPANY, INC.,  
a Delaware corporation, *et al.***

**Defendants.**

**Case No.: 2:14-CV-01374**

**Consolidated with:**

**Case No. 2:14-11011**

**Case No. 2:14-13164**

**Case No. 2:14-13454**

**CONSOLIDATED CLASS  
ACTION**

**PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

**PLAINTIFFS**, individually and on behalf of all others similarly situated, through undersigned counsel and Rule 23 of the Federal Rules of Civil Procedure, hereby file this Motion for class certification, respectfully requesting that this Honorable Court enter an Order granting this Motion. In support thereof, Plaintiffs attach the foregoing exhibits<sup>1</sup> through 16, incorporate the contemporaneously filed memorandum of law in support of the Motion and state as follows:

(1) certifying this action to be maintained as a class action with respect to particular issues pursuant to Federal Rule of Civil Procedure 23(c)(4), with respect to the overarching common issues of whether Defendants are liable and whether exemplary damages should be awarded as a multiplier of compensatory damages; and

(2) certifying a single Class of affected businesses and West Virginia American Water customers pursuant to Federal Rule of Civil Procedure 23(b)(3), to adjudicate the issue of

damages suffered by the Class resulting from the loss of use of tap water during the period of the “Do Not Use” (“DNU”) order.

**WHEREFORE**, based upon the foregoing, Plaintiffs respectfully request that the Court grant their Motion for class certification, enter an Order effectuating the decision, along with any other relief deemed necessary or proper.

Dated: July 6, 2015

Respectfully Submitted:

By Counsel,

/s/ Kevin W. Thompson

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT WEST VIRGINIA

CRYSTAL GOOD, individually and as  
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**CERTIFICATE OF SERVICE**

The undersigned counsel for Plaintiffs hereby certifies that on **July 6, 2015**, the foregoing *“Plaintiffs’ Motion for Class Certification”* was filed electronically with the Clerk of the Court through the CM/ECF system, which will send notification of the filing to all counsel of record.

Plaintiffs, By Counsel,

/s/ Kevin W. Thompson

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